UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NORMAN ORENTREICH, M.D.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: 04-11349-RGS
	)	
WAYNE RICHARD,	)	
	)	
Defendant.	)	

JOINT MOTION FOR 30-DAY EXTENSION OF DEADLINES TO COMPLETE DISCOVERY AND FILE DISPOSITIVE MOTIONS

Plaintiff Norman Orentreich, M.D. ("Plaintiff") and Defendant Wayne Richard

("Defendant") (collectively "the Parties"), by their undersigned counsel, hereby move this

Honorable Court to continue for 30 days certain deadlines set in this case. In support of this

Motion, the Parties state as follows:

1. At the Rule 16.1 conference ("Conference"), this Court set the following deadlines:

    a.   Discovery to be complete – December 31, 2004

    b.   Dispositive motions - February 1, 2005, with responses due 14 days

            thereafter

2. The Court did not set a trial date.

3. In the present case, both Parties have noticed the deposition of the other, and Plaintiff

propounded a request for production of documents to Defendant. The Parties will not propound

any additional discovery or notice any additional depositions during the next 30 days if this

motion is allowed by the Court.

    4. The Parties request this brief extension to accommodate the press of other business,

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including holiday schedules.

WHEREFORE, Plaintiff Norman Orentreich, M.D. and Defendant Wayne Richard pray

that their Joint Motion be allowed.

Counsel for Norman Orentreich, M.D.,

Counsel for Wayne Richard,
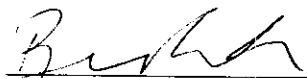
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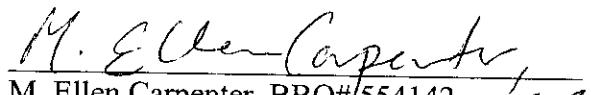
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Dated: December 30, 2004

CERTIFICATE OF SERVICE
I hereby certify that a true copy of the
above document was served upon the
attorney of record for each other party
by mail/hand on _12-30-04_